

Exhibit C

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

NATIONAL COUNCIL OF :
EXAMINERS FOR ENGINEERING : CIVIL NO.: 07-1479(SEC)
and SURVEYING, :
Plaintiff, : RE: COPYRIGHT INFRINGEMENT
vs : and BREACH OF CONTRACT
BETHZAIDA CAMERÓN-ORTÍZ, :
Defendant. :

TAKING OF THE DEPOSITION OF:
MS. BETHZAIDA CAMERÓN-ORTÍZ

Condensed

DATE : October 27, 2008
TIME : 9:30 A.M.
PLACE : Cancio Nadal Rivera & Díaz
403 Muñoz Rivera Avenue
San Juan, Puerto Rico 00918

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I N D E X

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MS. BETHZAIDA CAMERÓN-ORTÍZ

DIRECT EXAMINATION:

By Attorney Rivera-Ruiz

7

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BETHZAIDA CAMERÓN-ORTÍZ

A P P E A R A N C E S

FOR PLAINTIFFS: MARTA L. RIVERA-RUIZ, ESQ.
Cancio Nadal Rivera & Díaz
403 Muñoz Rivera Avenue
San Juan, Puerto Rico 00918

NOTARY PUBLIC: FERNANDO FORNARIS, ESQ.

DEPONENT: MS. BETHZAIDA CAMERÓN-ORTÍZ

INTERPRETER: MS. CAROL TERRY

COURT REPORTER: MS. GREGORIA ECHEVARRÍA
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BETHZAIDA CAMERÓN-ORTÍZ

P R O C E E D I N G S

(10:15 A.M.)

ATTORNEY RIVERA-RUIZ: For the record, this is Attorney
Marta Rivera-Ruiz, in the Civil Case of National Council of
Examiners for Engineering and Surveying against Bethzaida
Cameron-Ortiz, Civil Case Number 07-1479.

We're going to take the deposition today of Defendant
Bethzaida Cameron-Ortiz. If there is any objection for
Attorney Fernando Fornaris, from our firm, to proceed and
take the oath from both the Reporter and the Defendant, in
the case, Deponent.

ATTORNEY FORNARIS: No objection?

INTERPRETER: No, I'm the Interpreter.

ATTORNEY RIVERA-RUIZ: Carol Terry is here as well.
She's the Interpreter.

ATTORNEY FORNARIS: Well, we should also take her oath.

ATTORNEY RIVERA-RUIZ: Yes.

ATTORNEY FORNARIS: Okay, who's the Deponent?

ATTORNEY RIVERA-RUIZ: She is.

ATTORNEY FORNARIS: Madam, are you going to be the
Deponent in this case?

DEPONENT: Who's he?

ATTORNEY FORNARIS: I'm going to be acting as Notary
Public to take your oath.

DEPONENT: What do you want to know?

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ATTORNEY FORNARIS: I'd like you to raise your right hand, please.

Do you swear that the testimony you are about to give in the taking of this...

DEPONENT: My first language is Spanish.

INTERPRETER: I will be translating the oath to you as soon as he's finished.

ATTORNEY FORNARIS: So, I'll say it in Spanish, so that there's no problems, and you can state it for the record.

INTERPRETER: So, we'll do it in English.

Raise your write hand. Do you swear that all the testimony you're about to give in this deposition will be the truth, the whole truth and nothing but the truth?

DEPONENT: I do.

ATTORNEY FORNARIS: Do you swear that the testimony you are about to record and transcribe will be done so faithfully and correctly?

COURT REPORTER: Yes, I do.

(Whereupon,

MS. GREGORIA ECHEVARRIA

was duly sworn as the official Court Reporter of the proceedings held during the act of taking of deposition.)

ATTORNEY FORNARIS: So help you God. Do you swear that the testimony that's about to be given in the taking of this deposition will be interpreted by you faithfully and

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(Whereupon,

MS. BETHZAIDA CAMERÓN-ORTÍZ

after having been duly sworn, was examined and, through the Interpreter, testified upon her oath as follows:)

DIRECT EXAMINATION

BY ATTORNEY RIVERA-RUIZ:

Q Could you please provide me an address so I can send the transcript to your attention... where?

A The same one.

Q Can you repeat it for the record, please?

A It's written there, on the paper you have.

Q Could you please tell me if this is correct, the one I have here, *Barrio Garochales, Sector La Sabana, Carretera #682, Kilómetro 5.7, Arecibo, Puerto Rico, 00652*?

A Yes.

Q Please state your full name for the record?

A Bethzaida Camerón-Ortiz.

Q Bethzaida, has your deposition ever been taken before?

A No.

Q Have you been involved in any civil or criminal action either as Plaintiff or Defendant?

A I don't believe so.

Q So, you've never been in a criminal case before?

A No.

ATTORNEY RIVERA-RUIZ: Bethzaida, I represent the

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correctly?

INTERPRETER: I do.

(Whereupon,

MS. CAROL TERRY

was duly sworn as the official Interpreter of the proceedings held during the act of taking of deposition.)

ATTORNEY FORNARIS: Okay, so I'm excused.

ATTORNEY RIVERA-RUIZ: Thank you.

As I mentioned, my name is Marta Rivera-Ruiz. I'm the Attorney for Plaintiff, National Council of Examiners for Engineering and Surveying. From now on, I'm going to refer to Plaintiff as "Council".

We already took the oath of both... of the Defendant, the Court Reporter and the Interpreter.

Any objection that you may have as to any question will be stated for the record and preserved for trial. But, you must answer all the questions, except those based on privilege and form.

So, you must answer all the questions that you're going to be asked.

You're going to have twenty (20) days after you receive the transcript of the deposition to revise it. And, then, if I don't receive any revisions to the transcript, I will assume that the transcript is correct, and we're going to preserve it for further use.

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BETHZAIDA CAMERÓN-ORTÍZ

Council. From now on, I'm going to refer to it as the "company" and, as I said before, the "Council".

The purpose of this deposition is to ascertain all the facts relating to the Civil Complaint that the Council filed against you.

Bethzaida, I'm going to ask you some questions. You're going to have to answer all of them. If you do not understand a question, you must say so. Otherwise, we will assume that you clearly understood what was being asked.

Your testimony will be taken down by the Court Reporter and will be transcribed.

Remember that you are under oath, so you must answer all questions truthfully.

If, at any time, you need a recess, you may ask for one. But, you may not consult with any person regarding any questions covered here during that recess.

BY ATTORNEY RIVERA-RUIZ:

Q Bethzaida, do you understand all my instructions as I have explained them to you?

A A little.

Q What didn't you understand?

A Almost nothing.

Q So, you didn't understand that, if you need a recess, you can ask for one, and that you have to answer all the questions I'm going to ask you?

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BETHZAIDA CAMERÓN-ORTIZ

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1 A Something.

2 Q Again, if there is any question today that you do not

3 understand, please tell me immediately. Will you do that?

4 A Yes.

5 Q Do you have any questions at this time?

6 A No.

7 Q Bethzaida, did you consume any medication, alcohol or

8 any other substance which will interfere with your ability to

9 understand or respond to the questions?

10 A I don't think so.

11 Q "Yes" or "no"?

12 A I believe I did not.

13 Q Bethzaida, are you currently undergoing any medical

14 treatment?

15 A No.

16 Q Bethzaida, are you unable to testify for any other

17 reason?

18 A I don't know.

19 Q Bethzaida, have you ever used another legal name

20 besides Bethzaida Camerón-Ortiz?

21 A What does that mean?

22 Q Have you ever used another name besides Bethzaida

23 Camerón-Ortiz?

24 A Well, I have nicknames.

25 Q Which are your nicknames?

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1 Q Any other person?

2 A My brother.

3 Q Who else?

4 A NO AUDIBLE RESPONSE FROM DEPONENT.

5 COURT REPORTER: You have no verbal answer.

6 BY ATTORNEY RIVERA-RUIZ:

7 Q Could you please state the answer for the record,

8 please?

9 A Yes.

10 Q Bethzaida, is this your... do you own this home?

11 A No.

12 Q Who's the owner?

13 A I don't know.

14 Q Is it rented?

15 A It must be my mom's.

16 Q Bethzaida, what's your civil status, married or not

17 married?

18 A Single.

19 Q Have you been married before?

20 A No.

21 Q Do you have any children?

22 A No.

23 Q Bethzaida, do you read English?

24 A A little.

25 Q Do you speak English?

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BETHZAIDA CAMERÓN-ORTIZ

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1 A Betsy.

2 Q That's it?

3 A NO AUDIBLE RESPONSE FROM DEPONENT.

4 Q Bethzaida, what is your Social Security number?

5 A 584-94-9903.

6 Q Bethzaida, what is your date of birth?

7 A I think my mom remembers that.

8 Q When's your birthday?

9 A October 8th.

10 Q Which year were you born?

11 A I don't remember. It may have been in '63.

12 Q Bethzaida, where were you born?

13 A Arecibo.

14 Q Puerto Rico, right?

15 A Yes.

16 Q Bethzaida, state your current address for the record,

17 please?

18 A It's that one.

19 Q Barrio Garochales, Sector La Sabana, Carretera #682,

20 Kilómetro 5.7, Arecibo, Puerto Rico?

21 A Yes.

22 Q Since when have you been living at this address?

23 A Maybe two (2) years.

24 Q Do you live by yourself?

25 A With my mom.

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BETHZAIDA CAMERÓN-ORTIZ

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1 A A little.

2 Q Bethzaida, please give us a summary of your educational

3 background in chronological order, including dates of graduation

4 and a complete description of your studies from primary education

5 up to and including any and all graduate studies?

6 A For what?

7 Q This is some basic information that we're asking you as

8 part of the case. So, it's pertinent to our case. We're not going

9 to use against you. It's just for basic information.

10 A I don't understand the reason.

11 Q As part of this deposition, we're asking some general

12 questions from you.

13 A It's just that they already have that information.

14 Q Who are "they"? Who do you referring to as "they"?

15 A Your client. They're not going to give me an exam

16 unless I have a Bachelor's Degree and a full education.

17 Q I just want simple information. Which university did

18 you attend?

19 A They have that information.

20 Q I don't have it. I need it.

21 A Well, ask him for it.

22 Q Bethzaida, you are being instructed, you're under oath,

23 and this a Court proceeding, a judicial proceeding.

24 As per the Court's order, you must answer all the

25 questions you're being asked.

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BETHZAIDA CAMERON-ORTIZ

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1 So, please could you tell me where did you go to
2 college?
3 A Ask me one by one then, please.
4 Q Perfect.
5 A I went to the Poli-Technical University.
6 Q Before going to Poli-Technical University, where did
7 you graduate from highschool?
8 A In Arecibo.
9 Q Which university... which highschool? Sorry.
10 A In Arecibo, the old highschool, Cadilla, Maria Cadilla.
11 Q Maria Cadilla, that's the name of the school?
12 A Yes.
13 Q Did you graduate from senior year there?
14 A I believe so.
15 Q So, after going and attending Maria Cadilla, you went
16 to Poli-Technical University?
17 A No, first I tried other schools.
18 Q Which ones?
19 A I studied... I completed a course on Pharmacy
20 Assistant, at National College.
21 Q When?
22 A I don't remember the year.
23 Q And, after National College, what did you do?
24 A Then, I went to Sacred Heart University to study
25 Pharmacy. But, then I when to the Poli-Technical University.

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BETHZAIDA CAMERON-ORTIZ

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1 Q Did you complete pharmaceutical studies?
2 A No.
3 Q Why?
4 A I left to go to the Poli-Technical University.
5 Q In what year did you go to Poli-Technical?
6 A Eighty-something. I can't remember, '86, '87.
7 Q Did you graduate from Poli-Technical?
8 A Yes.
9 Q In which year?
10 A '93.
11 Q With which major degree?
12 A Civil Engineering.
13 Q Your GBA?
14 A I don't remember.
15 Q Average 'A', 'B', 'C'?
16 A Maybe 'B'. I don't know.
17 Q Bethzaida, do you have any graduate studies?
18 A No.
19 Q Any technical studies?
20 A Engineering, and Pharmacy Assistant.
21 Q Okay, do you have any kind of special training?
22 A No.
23 Q Have you taken any seminars or special courses in areas
24 related to your educational background?
25 A I don't remember.

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BETHZAIDA CAMERON-ORTIZ

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1 Q Have you been a member of any professional association?
2 A No.
3 Q Bethzaida, have you ever been accused of perjury?
4 A Never.
5 Q Bethzaida, have you ever been accused of a felony or a
6 misdemeanor?
7 A I don't remember. I believe I have not.
8 Q Bethzaida, have you ever been a Plaintiff or a
9 Defendant in any other civil action besides this one?
10 A I don't believe so.
11 Q Have you ever been a Defendant in a criminal action?
12 A I believe never.
13 Q Bethzaida, I'm going to refresh your mind. I'm going to
14 present you with an exhibit I have here.
15 ATTORNEY RIVERA-RUIZ: For the record, I'm about to show
16 Plaintiff a newspaper report. It's newspaper *Primera Hora*,
17 from April 19th. The title of the news article is "Cameron-
18 Ortiz expresses resentment. Pleads guilty for fraud."
19 (PAUSE)
20 (Revision of document by Deponent.)
21 BY ATTORNEY RIVERA-RUIZ:
22 Q Bethzaida, did you have an opportunity to revise this
23 exhibit?
24 A What is she talking about? Everybody knows I'm on
25 prohibition. What is she talking about?

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BETHZAIDA CAMERON-ORTIZ

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1 Q Bethzaida, the thing is that you just told me that you
2 have never been a Defendant in a criminal action.
3 A I thought you were saying besides what we're talking
4 about.
5 Q No, that...
6 A And, yes, I went through a Court proceeding. I went to
7 Court and I pled guilty for fraud. And, I am not serving my
8 sentence because of that.
9 Q All right, Bethzaida, maybe you didn't understand or I
10 didn't express myself clearly.
11 A That's what I think.
12 Q When I said if, besides the present one, it was
13 relating to a civil action.
14 Now, I'm asking you if you have ever been, including
15 this one, involved or been a Defendant in a criminal action?
16 A Well, I went to Court. I underwent Court proceedings, a
17 public proceeding, that everybody knows about. I just don't
18 understand the question she's asking. I don't know what else she
19 wants to know.
20 Q Were you the person accused in the criminal action?
21 A Well, you have the newspaper right there.
22 Q Could you state for the record if you were that person?
23 A Yes, I am that person.
24 Q So, you were the accused person in this criminal
25 action?

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A In Court, yes.

Q When was this?

A Last year, and it ended this year.

Q Bethzaida, was the case Pueblo of Puerto Rico against

Bethzaida Camerón-Ortiz?

A The attorneys know that. I don't know.

Q Did you have any attorneys in that case?

A Yes, I did.

Q Who were they? Could you tell me the names?

A Acevedo, Attorney Acevedo.

Q The name?

A I'd have to look it up. I can't remember right now.

Q Any other attorney?

A The one that was with him, but my contract was with him, with Acevedo.

Q How did you meet Acevedo?

A He was recommended to me by another attorney.

Q Who recommended him?

A Attorney Machicote.

Q And, the name?

A I don't remember.

Q Bethzaida, who paid for Attorney Acevedo's fees?

A My family, my mom and my brother.

Q Bethzaida, what was the criminal charge?

A I don't understand all that much about that.

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material, personal studying material. I wanted to have a method to study by because I am not fully bilingual. And, well, sixty-nine (69), sixty-eight (68), with seventy (70), you pass the exam.

And, so really I decided to obtain my own material to study with. So, I placed a camera in my jacket to record the exam, so the I could refer to it for my own personal studying purposes. And, that was all that I thought the day of the events.

And, it was all given back to them. I handed it all over to them. They kept it all, and that was it.

Q Which is "all"?

A Everything, everything that was recorded.

Q Something else? Any other thing that you gave them?

A Everything.

Q But, I don't know what's "everything". Could you tell me?

A The jacket with the equipment.

Q What type of equipment?

A A recorder.

Q Bethzaida, what was the outcome of the criminal case?

A What does that mean?

Q How did it end?

A A prohibition was negotiated.

Q Did you plead guilty?

A Yes.

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BETHZAIDA CAMERÓN-ORTIZ

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BETHZAIDA CAMERÓN-ORTIZ

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Q What you can describe, in general terms, you were accused of what?

A I didn't understand very well. I don't know if it's fraud or something like that.

Q Okay, and why?

A That's what I want to know.

Q What did you do... let me explain better. Let me rephrase.

Which were the facts of why you were being accused, for what facts?

A I don't understand.

Q Bethzaida, you said, in an earlier question, that you were accused of some questions and some fraud. You did state that for the record a couple of minutes ago. What did you do that you were accused?

A What did I do? I don't understand very well what answer it is that you want to hear.

Q It's simple, Bethzaida. I'm asking you what were the facts underlying your accusation?

A I really don't understand the question very well.

Q Bethzaida, why were you accused? You were a part of a criminal case. You're on prohibition right now.

What did you do that you were part of a criminal case, and that now you're on prohibition?

A Well, what happened was that I wanted to have studying

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Q Of what?

A Of that precisely.

Q Did you plead guilty of "Without authorization and with electronic equipment, recording questions and answers contained in the Engineering Exam of 2006."?

A I don't understand.

Q You mentioned that you were caught with equipment during the exam, and that you were recording questions for your personal use.

A Uh huh.

Q Did you plead guilty as to that?

A Yes.

Q Bethzaida, have you ever been a witness in a civil or criminal trial?

A I don't remember.

Q Have you ever served as a juror in a civil or criminal trial?

A I don't believe so.

Q Bethzaida, have you spoken to any attorney about this civil case?

A No.

Q Did you review any documents in preparation for this deposition?

A Not at all.

Q Did you meet with anyone else in preparation for this

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BETHZAIDA CAMERON-ORTIZ

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1 deposition besides an attorney?

2 A No.

3 Q Did you talk over the phone with anyone else in
4 preparation for this deposition?

5 A No.

6 Q Bethzaida, provide me a list of your employers from
7 your first job up to and including your last place of employment?

8 A Working, jobs, wow. Well, I'm not working at present.
9 And, if you're interested in the past, I would have to... I don't
10 believe I'm ready to answer that question.

11 That would be a list which I would have to sit down and
12 prepare for you.

13 Q Can you give me a general description from what you
14 remember without having to prepare a list?

15 A I don't understand the question per se.

16 Q It's simple, Bethzaida. Where have you worked?

17 A It's just that I work providing professional services.

18 Q Which type of professional services?

19 A Engineering Assistant.

20 Q To whom, assistant to whom?

21 A With Engineer Benito Román.

22 Q When did you work for him?

23 A That was years ago, quite a long time ago. It's been
24 three (3) years now since I haven't been doing anything.

25 Q For how long did you work for Benito Román?

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1 Q Any other types of clients, like companies or so?

2 A Yes, he was a consultant for gas stations.

3 Q Anyone else?

4 A I don't remember right now.

5 Q Bethzaida, how much did you get paid? How did Engineer
6 Benito Román compensate you for your work?

7 A It depends. It depended on the clients.

8 Q Did you provide him like some kind of invoice?

9 A No.

10 Q And, how did you get paid, hourly?

11 A No, he paid me depending on what the client...
12 depending on the contract. It was never a fixed salary. That's
13 called "professional services".

14 Q So, you never submitted to him an invoice for your
15 services by describing what you did or anything like that?

16 A No, I don't think so.

17 Q So, he paid you based upon what he got from the client?

18 A More or less, yes, a small percentage.

19 Q How much, in general terms, like an average?

20 A I don't remember, maybe twenty-five percent (25%) of
21 the contract. I don't know, something like that.

22 Q But, in like monetary terms, how much?

23 A It depends on the contract.

24 Q How much an average, like... I don't know... ten
25 thousand (\$10,000.00), five thousand (\$5,000.00), twenty-five

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1 A By professional services, about ten (10) years or more.

2 Q Which were your duties or responsibilities as to
3 Engineer Román?

4 A His assistant.

5 Q Did you work at his office?

6 A No.

7 Q From where did you work?

8 A From my house. Sometimes I would go to his office, his
9 home office, not like this here.

10 Q Bethzaida, could you explain...

11 A To call it something, a carport office.

12 Q Bethzaida, what did you do? What does an Engineering
13 Assistant do?

14 A Well, it's the same thing engineers do, except you
15 don't sign or stamp or seal things.

16 Q Could you describe your functions in general terms?

17 A Complete Civil Engineer.

18 Q What does that mean, "complete Civil Engineer"? I'm an
19 attorney. I don't know what an engineer does.

20 A Well, he's an Engineer and consultant, and we perform
21 all kinds of work that engineers do. It's simple. All the work
22 that a Civil Engineer, at the Bachelor's Degree level, performs,
23 designing homes, construction, inspections, permits, for clients
24 of lower... for simple clients that... for houses, for two (2) to
25 three (3) bedroom house, maybe two (2) bathrooms, for families.

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1 hundred (\$2,500.00)?

2 A No, it could be five hundred (\$500.00), eight hundred
3 (\$800.00), twelve hundred (\$1,200.00), depending on the case.

4 Q What was the most that you obtained from those
5 contracts?

6 A Well, I don't see why you're asking so many questions
7 about the past. Why?

8 Q Because it's part of the case. I'm just getting this
9 general information, general background questions.

10 We're just asking if it was... was twelve hundred
11 (\$1,200.00) the most you obtained from him?

12 A It may be in some case.

13 Q Besides Benito Román, did you work for someone else?

14 A No... well, I worked for FEMA for three (3) months
15 after Hurricane Hortensia. I also worked at the Tren Urbano, the
16 Urban Train, for two (2) months, in Río Piedras.

17 Q As to FEMA, did you do that like a temporary thing? It
18 was a temporary contract?

19 A Yes, temporary, three (3) months.

20 Q What did you do?

21 A Engineering Reports, Damage Reports.

22 Q Where?

23 A On the island of Puerto Rico.

24 Q So, you went like around the island?

25 A Wherever they sent me, the Municipalities they sent me

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BETHZAIDA CAMERÓN-ORTÍZ

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1 to.

2 Q Do you remember which ones?

3 A No, I cannot remember right now.

4 Q How much did you get paid for that work?

5 A I can't remember if it was ten (\$10.00) or twelve

6 dollars (\$12.00) per hour. I don't remember.

7 Q And, you mentioned that you worked for the Tren Urbano,

8 in Rio Piedras. Was that before or after FEMA?

9 A I think it was after.

10 Q What did you do at Tren Urbano?

11 A Civil Engineer.

12 Q Who contracted you?

13 A KKKZ.

14 Q Excuse me?

15 A KKKZ.

16 Q What's that?

17 A They're Americans.

18 Q Were you... what was your position? What position did

19 you hold there?

20 A Civil Engineer.

21 Q And, that was for two (2) months?

22 A Yes, two (2) or three (3) months.

23 Q Why did you leave Tren Urbano?

24 A They paid very little.

25 Q How much?

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BETHZAIDA CAMERÓN-ORTÍZ

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1 A Five hundred dollars (\$500.00) per week.

2 Q Did you supervise any employees at Tren Urbano?

3 A No.

4 Q Who was your direct Supervisor?

5 A I can't remember right now.

6 Q Any other employer?

7 A Well, when I was seventeen (17) years old...

8 Q No, you don't need to go back there. From... let me...

9 A No more, no more work. That's it. That is my three

10 (3)... oh, okay, Rio Construction.

11 Q Where?

12 A Rio Construction.

13 Q Rio?

14 A Yes, but I was studying. I was an engineering student

15 at the time.

16 Q While you were studying at Poli-Technical?

17 A Yes.

18 Q Who hired you?

19 A Rio Construction.

20 Q Do you remember who?

21 A My boss was Engineer Belandia.

22 Q Belandia. How did you get to Rio Construction?

23 A I don't remember.

24 Q Did you do like an internship with them?

25 A No, it was a four dollar (\$4.00) per hour job. It may

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BETHZAIDA CAMERÓN-ORTÍZ

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1 have been some kind of a Government program, but I don't

2 remember.

3 Q What did you do at Rio?

4 A I was his assistant.

5 Q What was your last job?

6 A The professional services occupation, with Román.

7 Q Okay, and you said that it's been like three (3) years

8 since you haven't worked for him?

9 A Uh huh.

10 Q So, you have been unemployed for three (3) years now?

11 A Uh huh, more or less.

12 Q Bethzaida, you answered to previous questions that you

13 were charged of copying exam questions from the Engineering Exam,

14 kind of like the Bar Exam. Which exam did you copy questions

15 from?

16 A Well, the year before, I had tried...

17 Q Which is the "year before"?

18 A 2006, 2007. When was that?

19 Q 2005, I think.

20 A No, I don't think it was 2005. I think it was 2006.

21 Q Okay.

22 A I attempted to do it that year, but it didn't come out.

23 So, that material stayed in that same equipment.

24 Q When you say intent or "attempt", what do you mean by

25 that?

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BETHZAIDA CAMERÓN-ORTÍZ

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1 A Because there were two (2) years. I think it was 2006.

2 I tried to record the material, but it didn't come out. And, I

3 left whatever was recorded in the recorder.

4 In fact, when you see that part, there is nothing

5 there. You can barely see what little came out.

6 Then, when I was able to do it, well, that's when I

7 handed everything over to them, that year. I just gave them

8 everything that I had. And, I told them "Here, you have

9 everything. I have nothing else."

10 Q So, let me see if I understood.

11 For that first year, you tried to record questions with

12 the same recorder.

13 You took a recorder into the exam room, in your jacket,

14 and you copied some questions in that first... for that first

15 year?

16 A More or less.

17 Q Well, is that what happened, how I interpreted it?

18 A More or less.

19 Q Okay, so, when you say that you left it there, did you

20 finish the exam or you just left the room?

21 A No, I handed over the equipment to them.

22 Q I'm referring to the first year, that you said that you

23 "tried".

24 What do you mean that you "tried"? Did you go to the

25 exam, recorded questions, and that was it? What happened? I don't

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BETHZAIDA CAMERON-ORTIZ

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1 understand when you said "tried".

2 A I don't understand what you don't understand.

3 Q You said that you tried one year, the first year.

4 A And, it didn't come out. The recording didn't come out.
5 That's all I'm trying to say. It didn't come out well. And,
6 that's when the next time I went. They know this. They have that
7 equipment.

8 Q What was the name of the exam that you... that first
9 time you tried to record?

10 A I don't know. It's a mess. I don't understand that very
11 well. It's... it could be the one I paid for. There's the basic
12 one and the engineering one.

13 Q So, you tried in the one year. It didn't record.
14 Nothing... you couldn't record any questions?

15 A Maybe one (1) or two (2) or three (3). I don't know,
16 but it was no good. For me to study, it wasn't good.

17 Q Did you finish your exam that first exam?

18 A I believe so. That may be.

19 Q Did you pass it?

20 A Wow, girl, how can you ask me that? You know I didn't.

21 Q So, because you couldn't record the questions or you
22 could record one (1) or two (2), as you mentioned...

23 A And, maybe if I had passed it, then the same thing that
24 happened to my colleague would have happened to me. She went out
25 to celebrate and drank, and then she ended up killing three (3)

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BETHZAIDA CAMERON-ORTIZ

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1 forgotten. And, I wanted to use that to study with.

2 Q Who else knew that you were planning to copy the
3 questions from the exam?

4 A Nobody personally that I can remember. This was
5 something that was very private, very personal, of mine.

6 Q You didn't tell it any... you didn't say it to... that
7 to anyone? You didn't mention it to anyone?

8 A No, I did this all my myself.

9 Q Whose idea was it to do so then?

10 A Mine.

11 Q Were you paid by anyone for doing so?

12 A No. What?

13 Q Whose idea was it to use audio and video equipment?

14 A Mine.

15 Q Where did the equipment come from, a store, a receipt,
16 dates? How did you pay for it?

17 A No, no, I don't have a receipt. I asked for that as a
18 gift.

19 Q From whom?

20 A From a friend.

21 Q A special occasion?

22 A Yes, a birthday gift.

23 Q So, who's your friend? What's the name of your friend?

24 A I call him Carlos.

25 Q Carlos what?

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BETHZAIDA CAMERON-ORTIZ

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1 people.

2 You know, they just make our lives impossible with that
3 exam. You know, you get a sixty-nine (69), a sixty-eight (68),
4 studying hard. It's just not fair.

5 Q Bethzaida, and then, because you could not record, it
6 was just one (1) or two (2) questions, you tried it a second
7 time?

8 A Yes.

9 Q How did you copy the questions?

10 A Recording them.

11 Q With what?

12 A With the equipment I had in the jacket.

13 Q Can you describe the equipment?

14 A Well, a small equipment with a camera and a base to
15 record on.

16 Q A video camera?

17 A Yes.

18 Q Did you have a tape recorder?

19 A No, digital.

20 Q And, that was it?

21 A Yes, that was it.

22 Q Why did you try to film or otherwise copy or obtain
23 Council's exam questions?

24 A Because I had graduated fifteen (15) years back, and
25 there was some material that, due to a lack of practice, I had

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BETHZAIDA CAMERON-ORTIZ

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1 A I can't remember his last name anymore.

2 Q So, you don't remember the last name of the Carlos that
3 gave you this present as a birthday gift?

4 A Right, I don't remember it anymore. It was a long time
5 ago already.

6 Q What did you request from him?

7 A I asked him to buy that for me, to give that to me.

8 Q And, what... can you describe the gift, like the
9 specifics?

10 A More or less, yes, because I didn't have the money. He
11 lent it to me.

12 Q So, he didn't buy it? You bought it?

13 A Uh huh.

14 Q He gave you the money and you bought the equipment?

15 A Uh huh, more or less, more or less, yes.

16 Q I don't understand "more or less". Either did you buy
17 it with money he gave you or did he go buy it?

18 A I asked him to buy it for me. I asked him for it as a
19 gift, and, yes, there was a purchase. He had to go buy it to give
20 it to me.

21 Q Well, who bought it, you or him?

22 A He bought it.

23 Q Did you go with him?

24 A No, it was by mail.

25 Q Catalogue?

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BETHZAIDA CAMERON-ORTIZ

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1 A I don't remember, maybe on the Internet.

2 Q Why did you buy it from the Internet or why did he buy

3 it from the Internet?

4 A No, I don't remember the details.

5 Q Excuse me?

6 A I don't remember the details about that.

7 Q Did he buy the video camera?

8 A I think so.

9 Q The deck that you had?

10 A What?

11 Q Did he buy the... you mentioned that you had like a

12 deck.

13 A It's a camera and a receiver.

14 Q And, he bought it? And, he paid for it?

15 A I believe so.

16 Q Who else saw the tapes that you made when you filmed

17 the booklets, the exam?

18 A Nobody saw that. The second part, which is what was

19 recorded, that was handed over to them.

20 Q Did anyone pay you to video or copy the exam?

21 A No, nobody.

22 Q Bethzaida, you have business cards made that read

23 "Cameron Engineers and Surveyors: Betsy Cameron-Ortiz, B.S.C.E.".

24 A Bachelor of Science, Civil Engineer.

25 Q What type of engineering and surveying work do you do?

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BETHZAIDA CAMERON-ORTIZ

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1 A He prepares them and seals them. I help him.

2 Q Oh, okay. Any other Engineer?

3 A No.

4 Q Are you a member of any engineering or surveying

5 organization?

6 A I don't believe so.

7 Q Are you a member or are you not?

8 A I don't believe so.

9 Q When was the first time you took a Council exam?

10 A Maybe 1993.

11 Q How many times have you taken the Council exam?

12 A Many.

13 Q About how many, more or less?

14 A Many times.

15 Q For the F.E. Exam, which is Fundamentals of

16 Engineering, what afternoon modules, either chemical, civil,

17 electrical, environmental, general, industrial or mechanical,

18 have you taken?

19 A I don't remember.

20 Q Do you remember taking the exam in October, '95?

21 A This may have been one (1) of the dates.

22 Q Did you take the F.E. Exam then?

23 A Maybe.

24 Q Did you take the F.E. Exam in October, '96?

25 A I don't remember. I would have to look this up or get

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BETHZAIDA CAMERON-ORTIZ

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1 A I have a minor in Surveying.

2 Q But, you have business cards with what I said, "Cameron

3 Engineers and Surveyors: Betsy Cameron-Ortiz", right?

4 A More or less.

5 Q So, what type of work do you do?

6 A That.

7 Q Engineering and surveying?

8 A Uh huh.

9 Q Have you ever stamped or sealed any engineering or

10 surveying drawings?

11 A No.

12 Q If you haven't done so, what Engineers or Surveyors

13 have done this for you?

14 A For me? It's not really for me. It's for the client.

15 Q All right, but who did the stamping and sealing?

16 A The one who does the contract, the engineer who does

17 the contract.

18 Q And, in your case, when you have like work for these

19 people, who's the person? Who does it?

20 A I don't understand.

21 Q Who seals and who stamps the drawings that you prepare

22 or kind of like assisted in doing?

23 A I am Engineer Román assistant.

24 Q So, Román was the only Engineer that stamped and sealed

25 the drawings that you did or that you...

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BETHZAIDA CAMERON-ORTIZ

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1 some documents I may have. I don't know.

2 Q You can take your time and refresh your memory. I mean

3 it doesn't matter.

4 A No, I don't remember.

5 Q Do you remember taking the F.E. Exam in April, '97?

6 A Maybe.

7 Q What about October, '98?

8 A Maybe then also.

9 Q What about April, '99?

10 A Maybe.

11 Q Did you apply to take the exam?

12 A Maybe. I don't know.

13 Q Has there been any occasion that you have applied for

14 an exam and then you didn't show up for it?

15 A Well, one time they didn't let me take the exam because

16 I arrived late. I arrived ten (10) minutes late.

17 Q That was the reason they gave you for not letting you

18 take the exam?

19 A Yes.

20 Q Any other occasion that you applied and you didn't show

21 up?

22 A No, that was the only time. I can't remember. I can't

23 remember right now.

24 Q Bethzaida, do you remember any specific modules taken

25 in the afternoon, which ones did you take?

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BETHZAIDA CAMERON-ORTIZ

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1 A No, I don't remember.
 2 Q Did you take chemical?
 3 A I don't think so.
 4 Q Have you taken the civil module?
 5 A I don't remember.
 6 Q Have you taken the electrical module?
 7 A I don't remember.
 8 Q The environmental?
 9 A I don't remember.
 10 Q The general?
 11 A Maybe.
 12 Q The industrial?
 13 A I don't remember.
 14 Q The mechanical?
 15 A I don't remember.
 16 Q In that exam that you were caught copying the
 17 questions, which module were you taking, what part of the exam?
 18 A I don't remember.
 19 Q Bethzaida, for some of your exams, you had a low score,
 20 and random patterns were used to answer the questions. Did you
 21 remove exam content?
 22 A No, never.
 23 Q How much time did you spend preparing to take the
 24 October, 2006 P.E. Civil Exam?
 25 A Several months.

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BETHZAIDA CAMERON-ORTIZ

39

1 Q Could you provide us a copy of those?
 2 A Yes.
 3 Q When?
 4 A Maybe.
 5 Q When?
 6 A I don't know. It depends on how I feel.
 7 Q Like in ten (10) days? Is that okay?
 8 A I don't know. Maybe I need to get some help. Don't you
 9 think?
 10 Q Help for what?
 11 A I don't know. What do you need them for?
 12 Q Well, you said that you could give them to me. You said
 13 "I can show them to you."
 14 A Well, yes, I can give that to you because I think that
 15 that... I think I can give that to you. And, actually, I can even
 16 bring that to you this afternoon, so you can see that there's
 17 nothing related to the exam on that.
 18 Q Okay, and did you... what other type of like study
 19 plan? You mentioned index cards. Any other like method?
 20 A No, index cards. Girl, I threw everything out. I just
 21 threw it all out, all the reviews I had done. Everything I had
 22 done to study I threw it all away.
 23 Q Did you draft those reviews?
 24 A Yes, because I don't intend to take that exam again.
 25 Q No, no, but my question is did you draft those

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BETHZAIDA CAMERON-ORTIZ

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1 Q How many, more or less?
 2 A I prepared for the other one. I prepared for the
 3 Fundamentals of Engineering Exam.
 4 Q But, you were caught copying the questions during the
 5 October, 2006 P.E. Civil Exam.
 6 A I believe so.
 7 Q My question is how much time did you spend preparing
 8 for that exam?
 9 A For that one, not much.
 10 Q What do you mean by "not much"? How long?
 11 A I mean not long.
 12 Q How much is "not long"?
 13 A Less than two (2) months.
 14 Q How much time did you spend preparing to take the
 15 October, 2006 F.E. Exam?
 16 A A lot, a long time.
 17 Q What is "a lot"?
 18 A Maybe seven (7) or eight (8) months. I don't know.
 19 Q What did you do to prepare for these exams?
 20 A I studied.
 21 Q Any specific plan?
 22 A Yes, I prepared index cards, which I can show to you.
 23 Q Do you have them with you?
 24 A No, of course not. I don't want to know anything about
 25 any of that anymore.

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BETHZAIDA CAMERON-ORTIZ

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1 yourself, the reviews?
 2 A Sure... no, actually, it's the copies that they sell
 3 around.
 4 Q So, they sell like specific reviews for each course?
 5 A Everybody knows that.
 6 Q Well, I don't know. I'm an attorney. I'm not an
 7 engineer.
 8 A They sell you reviews for the qualification exam with
 9 old copies of old engineering exams.
 10 Q Did you know anyone else that was taking the October,
 11 2005 exam? That's the one that you said was the first occasion
 12 that you tried to copy, but you could not?
 13 A What did you ask me?
 14 Q Did you know anyone else that was taking that 2005
 15 exam?
 16 A Well, there were two thousand (2,000) people there.
 17 Q Did you know anyone there?
 18 A Well, of course, yes. I had colleagues, people I knew
 19 there, sure.
 20 Q Did you know anyone else that was taking the October,
 21 2006 exam?
 22 A The same ones, more or less. You always see people you
 23 know.
 24 Q Bethzaida, do you know José Julian Alejandro Estrella?
 25 A I've never heard that name before.

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BETHZAIDA CAMERON-ORTIZ

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Q Do you know Javier Alfredo Del Fiero-Casiano?

A Never.

Q Do you know Juan Enrique Pérez-Arnaldi?

A No.

Q Do you know José Cristian Rodríguez-Rodríguez?

A José Cristian Rodríguez, never.

Q You said that you knew people that were taking the

October, 2005 exam, right?

A Uh huh.

Q Who did you know? Could you tell me the names of the people that you knew took the exam?

A I do remember seeing some people I knew on that day, but I can't remember their names. I mean these are people I know. If I see them, I know them, but I don't remember their names *per se*.

Q Bethzaida, do you know Gilberto Antonio Martínez-Alvarez?

A No.

Q Do you know Luis Reyes-Santiago?

A I don't believe so.

Q Carlos José Rodríguez-Lara?

A I don't believe so.

Q Do you Pedro Félix Santiago-Rivera?

A I don't think so.

Q Do you know Milton Roberto Escobar-Maysonet?

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BETHZAIDA CAMERON-ORTIZ

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A And, then it was recorded here.

INTERPRETER: The Deponent pointed to the left side of her ribs.

A And, then over here.

INTERPRETER: And, she pointed to the right side of her ribs.

It was on the jacket, and I handed it all over to them.

I said "Here, it's all in here. Take it.", and I gave it all to them.

ATTORNEY RIVERA-RUIZ: For the record, Defendant pointed also where she had a camera on her right wrist. There was some kind of cable strapped up to her shoulder, and then around her hip and waist, up through the left arm... left shoulder, and then down to her other wrist.

BY ATTORNEY RIVERA-RUIZ:

Q Bethzaida, did you use an audio/video transmitter, like a module, with a built-in microphone?

A The recording camera has all that.

Q Did you use a mini button video camera?

A Yes, those little ones.

Q Did you use a four channel receiver?

A I don't know about this.

Q But, you mentioned that you did have a receiver?

A Yes, it has a receiver.

Q Okay, and your friend Carlos bought that receiver?

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BETHZAIDA CAMERON-ORTIZ

42

A No.

Q Do you know Limaris Malavé-Vélez?

A No.

Q Do you know Alejandro Ramos-Vélez?

A No.

Q You mentioned that you knew people from the... this is the second exam I'm going to talk to you about... that you knew people taking the 2006 exam, the one that you were caught. Who did you know from that exam?

A Yes, but I don't remember their names. I mean these are familiar faces, but I don't remember their names.

Q Bethzaida, can you please identify all of the equipment you were using to copy the exams and provide an explanation of the capability of this specific equipment?

A Well, it was a camera that was here, and it would go through this way. And, there was a base here and another one here, two (2), little bases.

Q Could you...

A Until when is this going to last?

Q Like thirty (30) minutes more, and that's it.

A I'm hungry.

Q You did like some kind of gestures.

A It was all in the jacket, it was all in the jacket. There was a little camera here.

INTERPRETER: The Deponent pointed to the sleeve.

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BETHZAIDA CAMERON-ORTIZ

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A Yes.

Q And, he bought the camera?

A Uh huh.

Q And, he also bought the audio/video transmitter, the one that had the built-in microphone?

A Yes.

Q Did you have a video recorder, like a pocket video recorder, with you?

A How many times are you going to ask me the same thing?

Q Answer "yes" or "no".

A I don't know. I don't remember now what you're asking me. Could you repeat the question?

Q Sure. Did you have a pocket video recorder, a unit that had like a video line out-jack, with a built-in microphone?

A Something like that.

Q Did you have a T.V. cradle used to connect like to a T.V. or computer with audio/video "In" and "Out"?

A I don't know. I think so.

Q Did Carlos buy that as well?

A Yes.

Q Did you have battery packs?

A Yes, it had batteries.

Q But, did you have any battery packs besides the one that had the... extra batteries?

A I don't remember.

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BETHZAIDA CAMERON-ORTIZ

45

1 Q And, you were wearing a jacket like it was like kind of
2 modified to conceal everything that you had, like inside the
3 jacket?

4 A Yes.

5 Q When... did Carlos... this friend of yours, Carlos, did
6 he buy everything that I just mentioned?

7 A NO AUDIBLE RESPONSE FROM DEPONENT.

8 Q "Yes" or "no"?

9 A Yes. I'm sorry.

10 Q All right, and when?

11 A No, I don't remember. It was three (3) years ago. I
12 don't remember.

13 Q Where did he buy it?

14 A I don't know.

15 Q But, you said it was Internet.

16 A Uh huh, I think it was on the Internet.

17 Q How much did the equipment cost?

18 A I don't remember.

19 Q More or less?

20 A I don't remember.

21 Q Bethzaida, with the Civil Engineering Degree that you
22 have, how did you learn to put the equipment together?

23 A It comes with instructions.

24 Q So, you used the instructions to put everything
25 together?

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BETHZAIDA CAMERON-ORTIZ

47

1 during the exam?

2 A No, no, he's an older man, and he has nothing to do
3 with this. He's a very upright man.

4 Q Bethzaida, for the October, 2006 P.E. Civil Exam, you
5 were in the exam room for only fifty (50) minutes during the
6 morning. What did you do when you left the exam site?

7 A Nothing.

8 Q Where did you go?

9 A I don't remember. I don't think I did go anywhere.

10 Q But, you left the room?

11 A Of course.

12 Q And, you went where?

13 A Outside.

14 Q And, what did you do outside?

15 A I ate something. I don't know. I don't remember.

16 Q Did you meet or talk with anyone outside?

17 A Nobody.

18 Q Bethzaida, for the October, 2006 P.E. Civil Exam, why
19 did you have two (2) cell phones in your possession?

20 A Ah, because one (1) of them was for library purposes.
21 You know, because the other one was, more or less, old, and I
22 had... you know how cell phones are. One has a chip and others
23 don't.

24 Well, the other one I had for purposes of my contact
25 list. I still have it, if you want to see it.

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BETHZAIDA CAMERON-ORTIZ

46

1 A Uh huh, yes.

2 Q The proctors reported that you were quietly talking
3 with someone while taking the exam and copying the questions. Who
4 were you talking with?

5 A Nobody. To myself.

6 Q So, you were recording like your own voice?

7 A That was not recorded. That was turned off.

8 Q So, your testimony is that you were not talking like to
9 anyone?

10 A Of course not. No sound at all was recorded, only
11 video. That's how I believe it went.

12 Q No, but my question is the proctors reported that you
13 were talking to someone.

14 A The proctor assumed that, but that's not how it
15 happened.

16 Q So, it's your testimony that you didn't talk with
17 anyone?

18 A No, I didn't at all.

19 Q Bethzaida, who is Benito Román-López?

20 A That's the Engineer, Mr. Román.

21 Q Did he help you purchase the equipment?

22 A No.

23 Q Did he help you assemble the equipment?

24 A No.

25 Q Was he then the individual that you were talking to

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BETHZAIDA CAMERON-ORTIZ

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1 Q So, one was what you were using, and the other one was
2 like out of use, but you had your contacts there saved?

3 A Yeah, the other one didn't have a signal. It was not
4 activated.

5 Q Okay, you just had it because your contacts were in
6 there?

7 A Yes.

8 Q Bethzaida, for the October, 2005 F.E. Exam, you copied
9 the Civil and General Afternoon Disciplines.

10 Why did you choose to copy those modules? This is the
11 2005. Let me clarify, Civil and General Afternoon Disciplines.

12 A To review, to study.

13 Q Any other reason why you chose to copy these modules?

14 A No, it was to study.

15 Q For the October, 2005 F.E. Exam, what did you do with
16 the information you recorded?

17 A Nothing. It's there. I have nothing.

18 Q This was the first occasion. You were caught on the
19 second occasion.

20 What did you do with the information you recorded in
21 that first occasion?

22 A Nothing. It stayed right there, in the very same place
23 where it was.

24 Q Did you observe it after you recorded it? Did you use
25 it for something?

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BETHZAIDA CAMERON-ORTIZ

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1 A Yes, I saw there was nothing there.

2 Q When you say "there was nothing there", what did you

3 see?

4 A Nothing.

5 Q Like in blank?

6 A Like in nothing. Like nothing came out well.

7 Q How did it come out, blurry or something like that?

8 A Nothing, like you could not understand anything, maybe

9 one (1) or two (2), but nothing else.

10 Q So, you didn't do anything with that?

11 A Nothing. It remained right there, in the same

12 equipment.

13 Q Did you share that information with anyone?

14 A Nobody. That's the most that they can get out of me,

15 and they can have peace of mind in that regard. No one has that.

16 I have nothing. They have everything. I didn't keep anything, and

17 they know that.

18 Q After the October, 2006 P.E. Civil Exam, you took a

19 flight, on American Airlines, to Miami, Bethzaida.

20 What was the purpose of this flight, and who did you

21 visit?

22 A Well, I went on a trip. I took a trip.

23 Q What was the purpose of this flight, of this trip?

24 A To travel.

25 Q Pleasure?

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BETHZAIDA CAMERON-ORTIZ

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1 interview, and you don't remember the company that you were going

2 work with?

3 A No, I traveled for personal purposes, not to attend the

4 interview.

5 Q Then, how did the interview come up?

6 A A résumé I submitted.

7 Q Before going to Miami or while you were there?

8 A I don't know when he got it.

9 Q No, no, but when did you send it?

10 A I've sent so many.

11 Q So, how did it come about? You were there, and he

12 called you like coincidentally while you were there?

13 A Yes, I was over there.

14 Q You were in Miami already when he called you?

15 A Yes, yes.

16 Q And, then... and you... and what's the name of the

17 company?

18 A No, I don't remember.

19 Q Is that your testimony, that you don't remember?

20 A I don't remember.

21 Q Who did you visit in Miami?

22 A Friends.

23 Q Did you stay with them?

24 A Yes.

25 Q Bethzaida, do you know anyone else who has tried to

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BETHZAIDA CAMERON-ORTIZ

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1 A Pleasure, to rest, to enjoy myself, to look for work. I

2 went to a work interview.

3 Q Where?

4 A In Fort Lauderdale. I don't remember anything else.

5 Q Who did you interview with, with whom?

6 A I don't remember. I may have kept an e-mail, if I have

7 not erased it.

8 Q But, you went all the way to Fort Lauderdale to that

9 interview?

10 A Yes, I did.

11 Q And, that's why you took this flight to Miami? Besides

12 traveling, you went to an interview?

13 A No, I went. I brought a résumé. They called me from

14 there.

15 Q Who called you?

16 A A person, an American.

17 Q What is the name of the company?

18 A I don't know. I don't remember.

19 Q So, you...

20 A It was an interview to work in something about trains,

21 something like that.

22 Q In Fort Lauderdale?

23 A NO AUDIBLE RESPONSE FROM DEPONENT.

24 Q So, you took a... you bought a plane ticket.

25 You went all the way to Miami and Fort Lauderdale to an

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BETHZAIDA CAMERON-ORTIZ

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1 video or, otherwise, copy questions from the exams?

2 A No.

3 Q Have you ever memorized questions from a Council exam

4 and then copied them down afterwards?

5 INTERPRETER: Can you repeat the question?

6 BY ATTORNEY RIVERA-RUIZ:

7 Q Have you ever memorized questions from a Council exam

8 and then copied them afterwards?

9 A No. How can I even do that? I don't have a memory. I

10 don't remember anything anymore.

11 Q Bethzaida, have you ever taken notes during a Council

12 exam that contained exam questions or answers?

13 A No, no, ma'am.

14 Q Have you ever sold or given any questions or exam

15 material to anyone else?

16 A No one.

17 Q Bethzaida, what's your current income?

18 A Nothing, zero (0).

19 Q Then, what's the source of...

20 A The Family Card, on the 31st, I'm going to go to get

21 the Family Card, la Tarjeta de la Familia, because I don't even

22 have means to pay for my medical insurance anymore.

23 And, I'm a cancer patient. In the year 2000, I

24 underwent an operation on this breast.

25 INTERPRETER: The Deponent touched her left breast.

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BETHZAIDA CAMERÓN-ORTÍZ

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BETHZAIDA CAMERÓN-ORTÍZ

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1 A And, I received chemotherapy, which affected my heart
2 and I don't know what else.

3 And, in 2003, I received radiation, and I don't know
4 what else is going to happen to me now. I can't even pay my
5 medical insurance.

6 So, on the 31st, I'm going to the... what do you call
7 it... the Health Department.

8 Q Bethzaida, what's the source of your income? Who's
9 supporting you financially? Who's paying for your daily expenses?

10 A No one, my mom. I don't spend much.

11 Q But, you do have expenses?

12 A Very little.

13 Q What type of expenses do you have?

14 A Maybe gas. I'm in her car, and she gives me maybe
15 twenty (\$20.00) or thirty dollars (\$30.00) for gas, and that's
16 it.

17 Q You have a cell phone, right?

18 A It's in her name. It's on her account.

19 Q So, she's paying for everything, all of your expenses,
20 your mom?

21 A Yes, and my brother.

22 Q So, you do live with her?

23 A Uh huh, I gave her the Family Card so she can do the
24 groceries, buy the groceries, a hundred and twelve dollars
25 (\$112.00).

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1 A Right now, twelve (\$12.00).

2 Q By any chance, do you know, by memory, the number of
3 that account?

4 A No, I don't remember. But, I intend to close that
5 account.

6 Q Are you going to open another one?

7 A NO AUDIBLE RESPONSE FROM DEPONENT.

8 Q I'm just asking.

9 A Well, when the hens start to have their eggs and I can
10 sell those or when the lettuce grows, because that's what I'm
11 doing now. I'm farming.

12 Q Where are you doing farming now?

13 A At home, my mom's home.

14 Q Are you operating a farming business?

15 A No, it's about this big, from here to there, about
16 three (3) of these, maybe ten feet by five feet (10' x 5'),
17 thirty feet square. And, that's if they survive the insects and
18 small animals.

19 Q What are you farming? What type of... what are you like
20 growing there?

21 A Well, I have a little strawberry plan. I have peppers
22 and sweet peppers.

23 Q What else?

24 A Jalapeño, two (2) jalapeño plants, one (1) sweet pepper
25 plant.

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BETHZAIDA CAMERÓN-ORTÍZ

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BETHZAIDA CAMERÓN-ORTÍZ

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1 Q Monthly?

2 A Uh huh.

3 Q Do you have a bank account?

4 A There's five dollars (\$5.00) in my account or twelve
5 (\$12.00).

6 Q And, that's money your mom gives you?

7 A My mom gives me money, my aunt, my brother, my family,
8 but I'm going to close that account because I have nothing to put
9 in it. The bathroom?

10 Q Sure. Do you need a recess?

11 A Yes.

12 ATTORNEY RIVERA-RUIZ: All right, let's go off the
13 record.

(Off the record.)

(Brief recess.)

(Back on the record.)

17 BY ATTORNEY RIVERA-RUIZ:

18 Q Bethzaida, you mentioned that you have a bank account.
19 Is it like a checking account or a savings account, what type?

20 A Savings.

21 Q Savings. Which bank?

22 A Cooperativa de Ahorros y Credito de Zeno Gandia de
23 Arecibo. The Zeno Gandia Credit and Savings Union of Arecibo.

24 Q And, how much do you have, you mentioned? I don't
25 remember.

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1 Q Since when are you doing this?

2 A Maybe a year (1), maybe eight (8) months. I don't know.

3 Q Is this like from your mom's, like the patio?

4 A Yes.

5 Q Have you sold any of what you have planted?

6 A I haven't been able to yet.

7 Q Why?

8 A Because no fruits have come up. And, that's just for
9 purposes of consumption.

10 Q Your own?

11 A Yes, and my family. It's not really a business. It's
12 more to keep me occupied.

13 Q Are you planning to sell what you grow?

14 A Nothing for selling.

15 Q Do you own a car?

16 A No. I use mine... I mean I use my mom's or my
17 brother's.

18 Q Do you own a house?

19 A No.

20 Q Do you own any property or land?

21 A No, I have nothing, nothing in my name.

22 Q Do you own like stocks or bonds?

23 A No.

24 Q Any other type of assets?

25 A Nothing. It's just that my bail was set at a very high

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BETHZAIDA CAMERON-ORTIZ

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1 amount, a ridiculously high amount.

2 They set a bail that was so high as if I was the most
3 wanted criminal ever. My bail was set at four hundred thousand
4 dollars (\$400,000.00).

5 And, my mother's entire life savings had to be used for
6 that. And, we lost everything. We were left without anything, no
7 money, no savings.

8 And, then we had to get a loan. I don't know if it was
9 for seven thousand (\$7,000.00) or seventy-five hundred dollars
10 (\$7,500.00)... I know it was seven-something... to pay the
11 attorneys.

12 And, my brother lent me... gave me ten thousand
13 (\$10,000.00) or maybe eight thousand (\$8,000.00). I can't
14 remember exactly.

15 I know I had to pay fourteen thousand-something dollars
16 to the attorneys. And, that was it. And, actually, I still owe
17 the attorneys money. Let me answer this call.

18 ATTORNEY RIVERA-RUIZ: Let's go off the record for a
19 while.

20 (Off the record.)

21 (Brief pause.)

22 (Back on the record.)

23 BY ATTORNEY RIVERA-RUIZ:

24 Q Bethzaida, let's go back for a second.

25 You mentioned that your bail was set at four hundred

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BETHZAIDA CAMERON-ORTIZ

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1 thousand (\$14,000.00).

2 Q Do you have that only brother? It's just the two (2) of
3 you?

4 A There are three (3) of us, but there's only one (1)
5 that helps me. The other one has nothing.

6 Q And, is this brother the one that lives with you?

7 A No, he lives separately.

8 Q Here, in Puerto Rico?

9 A Yes. The one that lives with mom...

10 Q What's the name of this brother that helped you?

11 A Richard.

12 Q Richard?

13 A The same last names.

14 Q What's the name of your mom?

15 A Nereida.

16 Q Nereida Ortiz. Bethzaida, who will be your witnesses in
17 this case, if you have any?

18 A Witnesses for what?

19 Q I'm just asking are you going to have any witnesses?

20 A In relation to what?

21 Q You're a Defendant in this civil case.

22 A Uh huh.

23 Q Are you going to have any witnesses?

24 A I don't know, I don't know. I'm not even going to bring
25 an attorney.

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BETHZAIDA CAMERON-ORTIZ

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1 thousand dollars (\$400,000.00), right?

2 A Yes.

3 Q Out of that amount, what... how much did your mom pay
4 to bail you out?

5 A Forty thousand (\$40,000.00).

6 Q Did anyone help her with that?

7 A It was her savings, her entire life savings.

8 Q And, then she helped you out with part of the
9 attorneys' fees, together with your brother?

10 A Yes.

11 Q How much did you pay to the attorneys? You mentioned
12 fourteen thousand and something?

13 A Yes.

14 Q How much do you owe them?

15 A Maybe five (\$5,000.00) or six thousand (\$6,000.00). I
16 told him I could give him what I had left, which was fifteen
17 thousand dollars (\$15,000.00), and he said that he wanted twenty
18 thousand (\$20,000.00).

19 And, we stayed at... I wanted fifteen thousand
20 (\$15,000.00), and we stayed at fourteen thousand (\$14,000.00).

21 Q All right, so, out of that, your brother gave you ten
22 (\$10,000.00) and your mother gave you between seven (\$7,000.00)
23 and seventy-five hundred (\$7,500.00)?

24 A If I remember correctly, I think my brother gave me
25 eight thousand (\$8,000.00). I know that the sum was fourteen

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BETHZAIDA CAMERON-ORTIZ

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1 Q Have you made any attempts to retain an attorney?

2 A With what money?

3 Q I'm just asking if you have made any attempts?

4 A No, no.

5 Q No attempts. Bethzaida, have you ever given a written
6 statement in connection with this case?

7 A I don't understand, but I don't think so.

8 Q Have you ever given someone like a written declaration
9 as to this case?

10 A I don't remember.

11 ATTORNEY RIVERA-RUIZ: All right, Bethzaida, thanks for
12 coming. I know you came voluntarily, although you were
13 served.

14 And, I'm just thanking you for your time and for
15 answering all of my questions. We're done.

16 DEPONENT: That's it?

17 ATTORNEY RIVERA-RUIZ: Yes, we're done.

18 DEPOSITION CONCLUDED OCTOBER 27, 2008, AT 12:10 P.M.

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CERTIFICATE OF REPORTER

I, GREGORIA ECHEVARRÍA, Court Reporter and a member of Vega Reportage;

DO HEREBY CERTIFY: That the foregoing transcript is a full, true and correct record of the testimony given which was taken down by me and thereafter reduced to the typewritten form under my direction and supervision.

I FURTHER CERTIFY: That I am not in any way involved or interested in the outcome of said action.

WITNESS my hand this 1st day of December, 2008, in San Juan, Puerto Rico.

GREGORIA ECHEVARRÍA

Court Reporter

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CERTIFICATE OF DEPONENT

I, BETHZAIDA CAMERÓN-ORTÍZ, of legal age, certify that:

I have read the transcript of my deposition, taken on October 27, 2008, in the case before The United States District Court for the District of Puerto Rico, National Council of Examiners for Engineering and Surveying, Plaintiffs versus Bethzaida Camerón-Ortiz, Defendant, Civil Case Number 07-1479(SEC), from page one (1) through sixty-three (63) inclusive, together with the corresponding exhibits that were attached, if any.

If there are corrections or amendments to the aforementioned transcript, the same are included as an addendum to the transcript. The pages are initialed and numbered by me, commencing with page number sixty-four (64).

IN WITNESS WHEREOF, I sign this document in San Juan, Puerto Rico, on the ___ day of ___, 2008.

BETHZAIDA CAMERÓN-ORTÍZ

Deponent

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BETHZAIDA CAMERÓN-ORTÍZCERTIFICATE OF NOTARY PUBLIC

I, FERNANDO FORNARIS, ESQ., Attorney at Law and Notary Public, duly commissioned and qualified in and for the Commonwealth of Puerto Rico;

DO HEREBY CERTIFY: That by stipulation of the parties I acted as Notary Public. That the foregoing deposition was taken on the date and time heretofore mentioned; and

That the Court Reporter, the Interpreter and the Deponent were sworn by me before the commencement of the taking of the Deponent's testimony. Afterwards, my presence was excused by stipulation of the parties.

IN WITNESS WHEREOF, I sign this document and affix my notarial seal in San Juan, Puerto Rico, on the ___ day of ___, 2008.

FERNANDO FORNARIS, ESQ.

Notary Public

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Taking of the deposition of Bethzaida Cameron-Ortiz
October 27, 2008

<p style="text-align: center;">#</p> <p>#682 [2] 7:13 10:19</p> <p style="text-align: center;">\$</p> <p>\$1,200.00 [2] 24:3,11 \$10,000.00 [3] 23:25 57:13 58:22 \$10.00 [1] 25:5 \$112.00 [1] 53:25 \$12.00 [3] 25:6 54:5 55:1 \$14,000.00 [2] 58:20 59:1 \$15,000.00 [2] 58:17,20 \$2,500.00 [1] 24:1 \$20,000.00 [1] 58:18 \$20.00 [1] 53:15 \$30.00 [1] 53:15 \$4.00 [1] 26:25 \$40,000.00 [1] 58:5 \$400,000.00 [2] 57:4 58:1 \$5,000.00 [2] 23:25 58:15 \$5.00 [1] 54:4 \$500.00 [2] 24:2 26:1 \$6,000.00 [1] 58:15 \$7,000.00 [2] 57:9 58:22 \$7,500.00 [2] 57:10 58:23 \$8,000.00 [2] 57:13 58:25 \$800.00 [1] 24:3</p> <p style="text-align: center;">0</p> <p>0 [1] 52:18 00652 [1] 7:14 00918 [2] 1:16 2:5 07 [1] 63:7 07-1479 [1] 4:6</p> <p style="text-align: center;">1</p> <p>1 [10] 29:15,22 30:6 35:21 47:20 49:9 55:24 56:2 59:4 63:8 10 [3] 22:1 36:16 39:7 10' [1] 55:16 10:15 [1] 4:2 12:10 [1] 60:18 1479(sec [1] 63:8 15 [1] 30:24 17 [1] 26:7 18th [1] 15:17 1993 [1] 35:10 1st [1] 61:10</p> <p style="text-align: center;">2</p> <p>2 [16] 10:23 22:24,25 24:16 25:21, 22 28:1 29:15,22 30:6 38:13 42:17 47:19 49:9 55:24 59:2 2,000 [1] 40:16 20 [1] 6:21 2000 [1] 52:23 2003 [1] 53:3 2005 [6] 27:19,20 40:11,14 41:8 48:8,11,15 2006 [12] 20:5 27:18,20 28:1 37:24 38:5,15 40:21 42:8 47:4,18 49:18 2007 [1] 27:18 2008 [4] 60:18 61:10 62:14 63:4</p>	<p>25% [1] 23:20 27 [2] 60:18 63:4</p> <p style="text-align: center;">3</p> <p>3 [13] 21:24 22:25 24:14,19 25:22 26:10 27:7,10 29:15,25 45:11 55:16 59:4 30 [1] 42:20 31st [2] 52:20 53:6</p> <p style="text-align: center;">4</p> <p>403 [2] 1:15 2:4</p> <p style="text-align: center;">5</p> <p>5' [1] 55:16 5.7 [2] 7:14 10:20 50 [1] 47:5 584-94-9903 [1] 10:5</p> <p style="text-align: center;">6</p> <p>63 [1] 63:8 64 [1] 63:14 68 [2] 19:3 30:3 69 [2] 19:3 30:3</p> <p style="text-align: center;">7</p> <p>7 [2] 3:4 38:18 70 [1] 19:3</p> <p style="text-align: center;">8</p> <p>8 [2] 38:18 56:2 8th [1] 10:9</p> <p style="text-align: center;">c</p> <p>'63 [1] 10:11 '86 [1] 14:6 '87 [1] 14:6 '93 [1] 14:10 '95 [1] 35:20 '96 [1] 35:24 '97 [1] 36:5 '98 [1] 36:7 '99 [1] 36:9 'a' [1] 14:15 'b' [2] 14:15,16 'c' [1] 14:15</p> <p style="text-align: center;">A</p> <p>álvarez [1] 41:17</p> <p style="text-align: center;">A</p> <p>a.m [1] 4:2 ability [1] 9:8 able [2] 28:6 56:6 account [9] 53:18 54:3,4,8,18,19, 19 55:3,5 accusation [1] 18:19 accused [9] 15:3,5 16:20,24 18:2, 9,13,15,21 acevedo [4] 17:10,10,15,16 acevedo's [1] 17:22 act [2] 5:22 6:6 acted [1] 62:6 acting [1] 4:23</p>	<p>action [9] 7:20 15:9,11 16:2,13,15, 20,25 61:9 activated [1] 48:4 actually [3] 39:15 40:2 57:16 addendum [1] 63:12 address [3] 7:7 10:16,22 affected [1] 53:1 affix [1] 62:12 aforementioned [1] 63:11 afternoon [5] 35:16 36:25 39:16 48:9,11 afterwards [3] 52:4,8 62:10 age [1] 63:2 ago [5] 18:14 21:23,23 32:5 45:11 ahorros [1] 54:22 airlines [1] 49:19 alcohol [1] 9:7 alejandro [2] 40:24 42:4 alfredo [1] 41:1 almost [1] 8:22 already [4] 6:13 12:13 32:5 51:14 although [1] 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